

EXHIBIT “A”

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

NICOLAS S. NICOLAS,

v.

**DEUTSCHE BANK NATIONAL
TRUST COMPANY , AS
INDENTURE TRUSTEE FOR
AMERICAN HOME MORTGAGE
INVESTMENT TRUST 2006-3 and
PHH MORTGAGE CORPORATION.**

CIVIL ACTION NO. 4:20-CV-1263

**AFFIDAVIT IN SUPPORT OF PLAINTIFF'S MOTION TO WITHDRAW ADMISSION
STATE OF TEXAS §
COUNTY OF HARRIS §**

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared the person known by me to be Brandy M. Alexander who, after being by me duly sworn, testified as follows:

“My name is Brandy M. Alexander, I am over 18 years of age, I am competent to make this affidavit and I have personal knowledge of the matters stated herein.

I was not made aware of the admissions requests until Defendants had served me with their Motion for Summary Judgment, where the deemed admissions were incorporated.

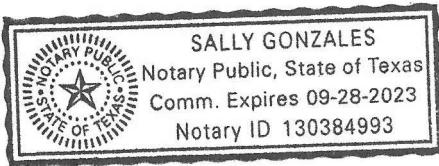
I saw in the evidence presented by Defendants’ Motion Summary Judgment that the admissions were sent via certified mail with return receipt. Upon investigation, I saw that the return receipt is noted as ‘COVID-19’ and signed by ‘BDP’ which is someone that I have no knowledge of.

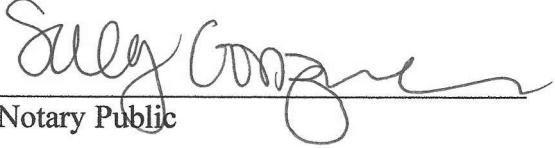
I also checked my emails and I did not find any email from Defendants regarding any admissions requests."



Brandy M. Alexander, Affiant

SUBSCRIBED AND SWORN TO before me on September 17, 2021.



Sally Gonzales

Notary Public